

# **GUIDELINES SG 1-24**

# CONFIDENTIALITY GUIDELINES OF A PUBLIC BODY COLLECTING PERSONAL INFORMATION THROUGH TECHNOLOGICAL MEANS

Coming into force on January 30, 2024

# CONFIDENTIALITY GUIDELINES OF A PUBLIC BODY COLLECTING PERSONAL INFORMATION THROUGH TECHNOLOGICAL MEANS

The present guidelines stem from the obligation of the English Montreal School Board (EMSB), under section 63.4 of the *Act respecting Access to documents held by public bodies and the Protection of personal information*, to publish its confidentiality governance on its website, in simple and clear terms, when it collects personal information by technological means. These guidelines are part of the other frameworks applicable to the EMSB, such as its <a href="Information Security Policy">Information Security Policy</a>, and apply to the websites of the EMSB, including those of its educational institutions.

#### 1. Other sites

In the event that the technological means refer to a website or technological means of another (third-party) organization, the privacy guidelines or policy of the third-party website or other technological means applies. In this case, please refer to their privacy guidelines or policy.

#### 2. About cookies

You should be aware that as soon as you access the websites of the EMSB, automatically and without you having to intervene, an exchange of information takes place between your computer and our server. This information does not identify you personally. The information exchanged is as follows:

- the domain name of the Internet provider;
- IP address (the number or number automatically assigned to the visitor's computer by the Internet Service Provider for the purpose of Internet browsing);
- browser type (Edge, Google, Firefox, etc.);
- the operating system the visitor is using (Windows, MAC OS, etc.);
- the date and time the visitor accesses the site;
- the pages viewed and the duration of those views:
- the address of the originating site if the visitor accesses our site from another site;
- device type and model (e.g., iPhone 11);
- the screen resolution of the device;
- the region or municipality, as determined by IP address.

This transfer of information arises from the technological requirements inherent to Internet browsing and is used for statistical purposes (e.g., compiling the number of visitors and identifying the most visited pages on the organization's website). Under no circumstances will we use them to compile lists of users.

Only the staff members concerned from the administrative services and institutions of the EMSB will have access to this information (e.g., administration of the institution concerned, staff of the Communications Office, staff of the Information Technology Department).

EMSB websites do not place any permanent cookies on users' hard drives, but only a temporary cookie required to improve the performance of certain features of the site.

You can use your browser options to disable the acceptance of cookies at any time. However, this may deprive you of some of the advanced features of the website. To manage cookies in a particular browser, see the following pages:

- Delete and manage cookies with Microsoft Edge
- Manage cookies and website data in Safari on Mac
- Enable or disable cookies in Chrome
- Allow and block cookies in Firefox

You can also manage the storage of cookies by changing the settings on your smartphone:

- Clear history and cookies saved in Safari on your iPhone, iPad, or iPod touch
- Delete your history and activity on Android

# 3. Personal Information Voluntarily Provided by the User

In the event that the User voluntarily communicates personal or other confidential information using an online form, only the information required to follow up on the User's request or to respond to the User's message will be collected and used.

Only the staff members of the EMSB concerned by this collection of personal information will have access to it (e.g., Educational Services, School Organization).

You can contact the EMSB using a variety of secure tools, including telephone and in-person services.

The transmission of information by e-mail is not completely secure. For this reason, the EMSB advises you to not disclose sensitive personal information, such as your social insurance number, by email. It does the same when it involves the transmission of sensitive personal information.

### 4. Personal Information Collected by Mobile Applications

The EMSB currently does not publish any first-party mobile applications on the Apple App Store or Google Play store. For the privacy guidelines or policy of any third-party applications (e.g., <u>mParent</u> for Mozaik access), please visit the developer's website directly.

# 5. Measures taken to ensure the confidentiality and security of personal information

The EMSB is committed to ensuring the protection of the personal information entrusted to it, in accordance with its obligations.

Personal information is retained for as long as necessary to carry out the activities of the School Board and in accordance with applicable legislation.

To this end, the EMSB implements security measures to ensure the confidentiality of the personal information it collects, such as computer software or strict procedures for accessing this information, as well as control and verification measures, including:

- Secure Sockets Layer (SSL) Encryption
- Access Management Authorized Person
- Access Management Data Subject
- Network Monitoring Software
- Computer Backup
- Firewalls

The EMSB also has strict procedures in place in the event of a confidentiality incident, the purpose of which is to limit the consequences of such an incident. It ensures that personal information is destroyed in a secure manner to ensure the confidentiality of the information.

All staff members of the EMSB are required to respect the confidentiality of the personal information that is collected and sign a form accepting its Information Security Policy.

# 6. Rights of access and rectification

Any user may request access to their personal information held by the EMSB in accordance with the provisions of the *Act respecting Access to documents held by public bodies and the Protection of personal information*. They may also request the rectification of personal information concerning them when it is inaccurate, incomplete or ambiguous or when the collection, communication or retention of such personal information is not authorized by law.

This request must be made in writing to the Access to Information and Privacy Officer:

Nathalie Lauzière
Access to Information and Privacy Officer
English Montreal School Board
6000 Fielding Avenue
Montreal, Quebec H3X 1T4
nlauziere@emsb.qc.ca

# 7. Complaint Process

The person responsible for access to documents and the protection of personal information is also responsible for ensuring compliance with the present guidelines. To make comments or complaints about non-compliance with the guidelines, the request must be made in writing:

Nathalie Lauzière Access to Information and Privacy Officer English Montreal School Board 6000 Fielding Avenue Montreal, Quebec H3X 1T4 nlauziere@emsb.qc.ca

# 8. Information about the Guidelines

If you have any questions about the guidelines, you can contact the person in charge by consulting the Contact Us section or contact us as follows:

Nathalie Lauzière
Access to Information and Privacy Officer
English Montreal School Board
6000 Fielding Avenue
Montreal, Quebec H3X 1T4
nlauziere@emsb.qc.ca

# 9. Changes to the Guidelines

The EMSB may modify the present Privacy Guidelines at any time and at its sole discretion. Users are therefore asked to regularly consult the EMSB website to verify if any changes have been made.

# 10. Coming into force or updating

These guidelines were approved by the Access to Information Committee and entered into force on January 30, 2024.